

Federal Defenders OF NEW YORK, INC.

Southern District
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Leonard F. Joy
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Southern District of New York
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Attorney-in-Charge

August 4, 2008

By Facsimile (212) 805-6304

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: SEP 05 2008
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Re: United States v. Rosemary Borrel
08 Cr. 348 (PAC)

Dear Judge Crotty:

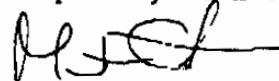
I represent Rosemary Borrel in the above-captioned case, and write to request that her bail conditions be modified. Specifically, I request that mental health treatment be added as a condition of her release. I have spoken to Ms. Borrel and to her Pretrial Services Officer, Luis Piedra, who agrees that Ms. Borrel will benefit from such treatment. I have also spoken to Assistant United States Attorney Steve Kwok, who consents to this request.

Ms. Borrel is charged in a one-count indictment with conspiring to possess with the intent to distribute thousands of "Ecstasy" pills, in violation of 21 U.S.C. 841(a)(1) and 841(b)(1)(c). On January 24, 2008, Magistrate Judge Gabriel W. Gorenstein imposed the following bail conditions: a \$100,000 personal recognizance bond to be co-signed by three financially responsible people; travel restricted to the Southern and Eastern Districts of New York; surrender of travel documents (and no new applications); and strict pretrial supervision (due to her pregnancy, this Court ordered that her supervision be reduced to "regular" pretrial supervision).

If helpful to the Court, I can provide more detail concerning her psychological condition, but generally her mental health issues are related to the stress associated with this case, her recent and very difficult pregnancy (her baby is healthy), and the fact that she will require further surgery.

Thank you for your consideration of this request.

Respectfully submitted,



Martin S. Cohen
Attorney for Rosemary Borrel
212-417-8737

* The condition of Rosemary Borrel's release is modified as requested

SO ORDERED: SEP 05 2008


HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE

cc: Steve Kwok, AUSA, via facsimile 212-637-2937
Luis Piedra, Pre-Trial Services, via facsimile 212-805-4176

MEMO ENDORSED

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